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Counsel for Plaintiff Bank Leumi USA

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

BANK LEUMI USA,

Plaintiff,

– against –

DAVID EHRLICH, ANGELA TYKOCKI,
ENRIQUE EHRLICH, and
SARA GOLDSTEIN,

Defendants.

Case No. 12-CV-4423 (AJN)

**ORAL ARGUMENT
REQUESTED**

NOTICE OF MOTION

TAKE NOTICE that upon the accompanying Declarations of Donald L. Bittker and James Ancone, together with the exhibits annexed thereto, Plaintiff Bank Leumi USA's ("BLUSA") Statement of Undisputed Facts Pursuant To Rule 56.1 Of The Local Civil Rules For The Southern District Of New York, and BLUSA's Memorandum of Law, the undersigned will move this Court, before the Honorable Alison J. Nathan at the United States Courthouse, 40 Foley Square, Room 906, New York, New York, at such time as the Court may direct, for an Order pursuant to Fed. R. Civ. P. 56(a) granting summary judgment in favor of BLUSA on Count I of its complaint and granting summary judgment in favor of BLUSA on Defendants' counterclaims and dismissing those counterclaims in their entirety with prejudice.

Dated: August 14, 2014
New York, New York

MAYER BROWN LLP

By: /s/ Mark G. Hanchet

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